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*Attorney for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ALLSTATE INSURANCE COMPANY;  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY; ALLSTATE  
INDEMNITY COMPANY; and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

OBTEEN N. NASSIRI, an individual; and  
MED ED LABS, a Nevada nonprofit  
corporation,

Defendants.

CASE NO. 2:20-cv-00425-JCM-DJA

**STIPULATION AND ORDER EXTENDING BRIEFING ON  
PLAINTIFFS' MOTION TO COMPEL DISCOVERY RESPONSES [Doc. 76]  
(FOURTH REQUEST)**

*The parties have made and been granted a number of extensions on this matter already; however, they have, in good faith, been working towards a resolution of the matters. Substantial progress has been made since the last request was granted. The purpose of the present request is not for undue delay.*

By and through their respective counsel of record, Defendants OBTEEN N. NASSIRI ("Nassiri") and MED ED LABS ("MEL") (collectively "Defendants") and Plaintiffs ALLSTATE INSURANCE COMPANY, ALLSTATE PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY, and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (collectively "Plaintiffs") hereby tender to the Court

1 this *Stipulation and Order Extending Briefing on Plaintiffs' Motion to Compel Discovery*  
2 *Responses [Doc 76] (Fourth Request)*. With this stipulation, Plaintiffs and Defendants (each a  
3 "Party" and collectively the "Parties") hereby stipulate and agree as follows:

4 1. The Parties are continuing in good faith to resolve a discovery dispute.

5 2. Since the Court granted the last extension—

6 a. On March 16, 2021, Defendants served two more supplements to their  
7 initial disclosures, including about 350 pages of additional documents;

8 b. To date, Defendants have produced over 5,700 pages of documents;

9 c. On March 17, 2021, MEL served its second supplement to responses to  
10 requests for production;

11 d. On March 17, 2021, Plaintiffs served their second set of requests for  
12 production upon MEL; and

13 e. On March 17, 2021, Plaintiffs served their first set of requests for  
14 production upon Nassiri.

15 3. In order to provide Plaintiffs with sufficient time to review Defendants'  
16 supplements and document production identified above, which they need to do to  
17 determine whether to withdraw *Plaintiffs' Motion to Compel Discovery Responses (filed*  
18 *Feb. 10, 2021) [Doc. 76]* (the "Motion"), the Parties have agreed to extend the briefing  
19 deadlines on the Motion as follows:

20 a. The deadline for Defendants' response to the Motion shall be extended  
21 from March 19, 2021 (old deadline) to March 26, 2021 (new deadline);  
22 and  
23

1           b.       The deadline for Plaintiffs' reply in support of their Motion shall be  
2                       extended from April 2, 2021 (old deadline) to April 9, 2021 (new  
3                       deadline).

4           IT IS SO STIPULATED.

5       Dated: March 18, 2021

March 18, 2021

6           **FRIZELL LAW FIRM**  
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8           Henderson, Nevada 89014

**FORAN GLENNON**  
2200 Paseo Verde Parkway, Suite 280  
Henderson, Nevada 89052

9       By: /s/ R. Duane Frizell  
10       R. DUANE FRIZELL, ESQ.  
11       Nevada Bar No. 9807  
12       Attorney for Defendants

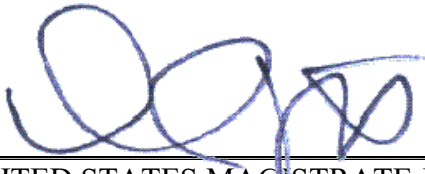
By: /s/ Lee H. Gorlin  
DYLAN P. TODD, ESQ.  
Nevada Bar No. 10456  
LEE H. GORLIN, ESQ.  
Nevada Bar No. 13879  
Attorneys for Plaintiffs

**ORDER**

Having reviewed the foregoing Stipulation of the Parties, and finding good, just, and sufficient cause therefor, it is hereby entered as an Order of the Court.

IT IS SO ORDERED.

DATED: March 19, 2021

  
UNITED STATES MAGISTRATE JUDGE  
CASE NO. 2:20-cv-00425-JCM-DJA

***Submitted by:***

**FRIZELL LAW FIRM**  
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By: /s/ R. Duane Frizell  
**R. DUANE FRIZELL, ESQ.**  
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